

May 14, 2008

## VIA ELECTRONIC FILING

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capital Building, First Floor
500 East Capitol Avenue
Pierre, SD 57501

Re: Fort Randall Telephone Company's Application for Waiver of Switched Access Cost Study

Dear Ms. Van Gerpen:

Attached via E-Filing is Fort Randall Telephone Company's Application for Waiver of Switched Access Cost Study, together with a Certificate of Service.

Very truly yours,

Michael J. Bradley

Attorney At Law (612) 877-5337

BradleyM@moss-barnett.com

MJB/krm Attachments

1141921v1

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of May, 2008, the attached FORT RANDALL TELEPHONE COMPANY'S APPLICATION FOR WAIVER OF SWITCHED ACCESS COST STUDY was E-Filed upon the following party:

Patricia Van Gerpen Executive Director South Dakota Public Utilities Commission Capitol Building, First Floor 500 East Capitol Avenue Pierre, South Dakota 57501

and copies sent electronically or via U.S. mail, addressed to the following:

Rolayne Ailts Wiest South Dakota Public Utilities Commission Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

Bruce Hanson Hanson Communications, Inc. 227 S Main Street Clara City, MN 56222

Norm Keimig Olsen Thielen & Co., Ltd. 223 Little Canada Road St. Paul, MN 55117-1376

....

## BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

## FORT RANDALL TELEPHONE COMPANY'S APPLICATION FOR WAIVER OF SWITCHED ACCESS COST STUDY

TC-08	
TC-08	

Fort Randall Telephone Company ("Fort Randall") respectfully asks the South Dakota Public Utilities Commission ("Commission") to grant it a waiver, under ARSD § 20:10:27:02, of the switched access cost study required by ARSD § 20:10:27:07.

ARSD § 20:10:27:07 requires a carrier's carrier to file cost data in support of its switched access service tariff no less than once every three years. ARSD § 20:10:27:02 provides that the Commission may, for good cause shown, either by its own motion or by application from a carrier's carrier, temporarily waive or suspend any rule in Chapter 20:10:27.

Fort Randall requests a waiver of the cost study requirement because (1) producing such a study is costly and consumes a great deal of resources; and (2) Fort Randall does not intend to raise access rates at this time, although preliminary analysis indicates that a cost study would likely support higher rates than are currently approved.

An identical motion by Qwest Corporation was approved by the Commission in its Order Granting the Waiver Request, TC08-003 (February 27, 2008). Qwest, like Fort Randall, based its request on the desire to avoid the cost and significant resource requirements of producing a study; which study would likely support higher rates.

WHEREFORE, Fort Randall submits that it has provided the Commission with good cause, and it respectfully asks the Commission to temporarily waive or suspend the requirement in ARSD § 20:10:27:07 for the current three-year study period.

Respectfully submitted this 14<sup>th</sup> day of May, 2008.

By:

Michael J. Bradley
MOSS & BARNETT

A Professional Association 4800 Wells Fargo Center

90 South Seventh Street

Minneapolis, MN 55402-4129

Telephone: (612) 877-5000

Attorneys on behalf of Fort Randall Telephone Company